

MEMO ENDORSED

**THE LAW FIRM OF HUGH H. MO, P.C.**

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April 5, 2022

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

RECEIVED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
4-12-22

Re: *United States v. Yunseo Lee, et al.*  
Case No.: 20-cr-648 (ALC)

Dear Judge Carter:

We are the attorneys for Yunseo Lee in the above-referenced matter and hereby submit this letter request to modify her travel restrictions to the continental United States pursuant to the terms and conditions of her release, for business related travel.

Ms. Lee is currently a Supply Chain Manager and oversees inventory control of the company's warehouse and packaging vendors located throughout the United States. Attached please find a letter from Ms. Lee's employer, Sung Yong Yoo, President of Farm Hannong America, Inc., who indicates that her job as a Supply Chain Manager requires visiting third party warehouses and facilities located in California, Illinois, Georgia, Missouri, North Dakota, and Ohio.

Most of the business travel will be planned in advance and she will advise Pretrial Services and provide flight information and itineraries as she receives them from her employer.

Currently, she is released on a \$200,000 PRB bond, with travel restricted within this District, the Eastern District of New York along with the District of New Jersey. She was also required to surrender her passport and submit to Pretrial Services supervision. To date, Ms. Lee has been in full compliance with the terms and conditions of her release.

We have conferred with Pretrial services and they have no objections to our request to amend Ms. Lee's travel restrictions to the continental United States. We reached out to the Government but have not been advised of their position on this request. Due to the need of Ms. Lee's job to schedule upcoming travel, we are now submitting this request.

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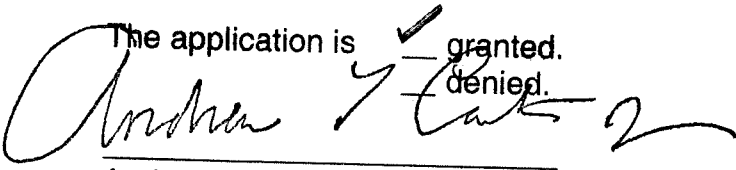
Accordingly, we hereby request the Court so ordered the modification of Ms. Lee's travel restrictions for out-of-state business travel.

We thank the Court for its kind consideration.

Respectfully submitted,

Hugh H. Mo

The application is ☒ granted.  
☐ denied.

  
\_\_\_\_\_  
Andrew L. Carter Jr, U.S.D.J.  
Dated: **4.12.22**  
NY, New York